

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

December 05, 2019

David J. Bradley, Clerk of Court

United States of America

v.

Nancy JAVIEL

Case No. **4:19mj2237**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 6, 2018 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC Section 846, 841 (a)(1) and  
(b)(1)(A)(vii)


Offense Description

Conspiracy to Possess with the intent to distribute a controlled substance, to wit: 50 grams or more of methamphetamine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

See Affidavit

☐ Continued on the attached sheet.

  
Complainant's signature  
Moises Zamora, TFO  
Printed name and title

Sworn to me telephonically.

Date: 12/05/2019

City and state: Houston, Texas

  
Judge's signature  
Christina A. Bryan, US Magistrate Judge  
Printed name and title

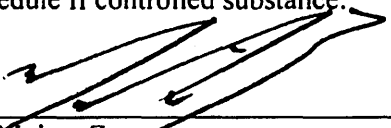
**AFFIDAVIT OF TASK FORCE OFFICER MOISES ZAMORA IN SUPPORT OF  
CRIMINAL COMPLAINT**

Your affiant, Task Force Officer, being duly sworn, deposes and states the following:

1. I, Moises Zamora, am a Houston Police Officer and I am assigned as a Task Force Officer (TFO) to the United States Drug Enforcement Administration (DEA), Department of Justice, Houston, Texas. I have been a Houston Police Officer for the last 16 years and have been assigned as a TFO assigned to DEA since February of 2013. Through formal law enforcement training and experience, I have investigated numerous complex historical international and domestic drug trafficking cases, and have become very familiar with the methods and means by which Drug Trafficking Organizations smuggle narcotics into the United States and how they return the proceeds of narcotics sales back to their heads of organization.
2. In an undercover capacity and through several active undercover operations into a Mexican Drug Trafficking Organization (DTO) in the summer of 2018 I was able to establish cellular phone contact with a well-known Mexican based methamphetamine source of supply (SOS) known as "Pequeño". I told "Pequeño" that I wanted to purchase crystal methamphetamine from him in Houston, Texas. "Pequeño" agreed to sell me crystal methamphetamine in Houston, Texas and put me in cell phone contact with an unknown Mexican male who was going to coordinate the delivery of the drugs. I note that all telephone conversations and messages with suspects described in this affidavit were done so on a recorded line.
3. In September of 2018 I began negotiations to purchase ten (10) kilograms of crystal methamphetamine from this unknown Mexican male (UM1), who I believe was in the country of Mexico during this incident, for the price of \$4,800.00 per kilogram. UM1 told me that his niece, who was in Houston, would contact me and that she would coordinate the delivery. I later made cellular phone contact with a person that was later identified as Nancy JAVIEL and she told me that she wanted to meet to speak in person regarding the logistics of the delivery of the drugs. On September 6, 2018 I met with JAVIEL in her vehicle at a McDonald's parking lot located on the southeast side of Houston, Texas. I noted that JAVIEL was wearing medical scrubs and further noted that she stated that she was on her lunch break. Ultimately we agreed that JAVIEL would deliver the drugs to me later that afternoon and that I would deliver payment at a later date.
4. Surveillance was established on JAVIEL and she was ultimately put down at her job in Pasadena, Texas. At about 1700 hours JAVIEL was seen leaving her job and re-enter the same vehicle she used to meet me. Surveillance was maintained on her and she was observed make several stops apparently picking up her three young kids. After picking up her kids, JAVIEL drove to a convenience store located at 9220 Clearwood in Houston, Harris County, Texas. Once there, JAVIEL sent me a text to meet her there. I then went to the target location and met with her at her car, which was parked by a gas pump. JAVIEL told me that she only had four (4) kilograms of crystal methamphetamine and not the full ten (10). I told JAVIEL that I wanted the full ten (10) kilogram and she told me that she did not have control over the drugs.
5. I told JAVIEL that I was going to leave and speak to UM1 about the situation. I then left the target location and spoke to UM1 over the phone. UM1 told me that there had been a mistake and that

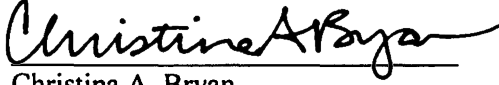
there were only four kilograms left. Ultimately I agreed to purchase the available four (4) kilograms from UM1 and later received a text message from JAVIEL to meet her at the Academy Sports that was down the road. At about 1840 hours JAVIEL was observed walking up to the taco truck that was in the same parking lot as the convenience store and order. Once she received her order, she began to walk back to her vehicle and that is when she apparently opened her truck with her remote. At that time a person that was later identified at Ciriaco de Jesus GUILLEN-Guido walked up to her trunk and placed a 5 gallon bucket inside.

6. JAVIEL then entered her vehicle and drove away from the convenience store with her three kids and towards to the Academy Sports located on Clearwood and the Gulf Freeway. JAVIEL was then stopped on traffic as she turned into the McDonald's parking lot located at 8920 Clearwood in Houston, Harris County, Texas. The uniformed officer made contact with JAVIEL and ultimately asked her for permission to search her vehicle. JAVIEL then told the uniformed officer that there was something in the trunk. The uniformed officer then told JAVIEL that he was going to run his K-9 partner on her car and asked her to take her three children and step out to the side at a safe distance.
7. The uniformed officer then ran his K-9 partner on JAVIEL's vehicle and noted that his K-9 partner alerted to the odor of narcotics emitting from the trunk area of JAVIEL's vehicle. A search of the trunk of JAVIEL's vehicle resulted in the finding of a large plastic bucket that contained four (4) plastic containers that were filled with a crystal like substance that is consistence with crystal methamphetamine. A later laboratory analysis revealed that the crystal like substance contains methamphetamine with a total of approximately 4 kilograms.
8. Based on the foregoing, I respectfully submit that probable cause exists to believe that **Nancy JAVIEL** has committed a violation of Title 21 USC Section 846, 841 (a) (1) and (b) (1) (A) (ii), specifically, Conspiracy to Possess with the intent to distribute a controlled substance, to wit: 50 grams or more of methamphetamine, a Schedule II controlled substance.

  
Moises Zamora  
Task Force Officer  
Drug Enforcement Administration

Sworn to and subscribed telephonically to me on the 5th day of December, 2019, and

I hereby find probable cause.

  
Christina A. Bryan  
United States Magistrate Judge  
Southern District of Texas